

293D BASE SUPPORT BATTALION MANNHEIM

ASBESTOS



MANAGEMENT PLAN

September 2001

**DEPARTMENT OF THE ARMY
293D BASE SUPPORT BATTALION
UNIT NUMBER 29901
APO AE 09086**

AEUSG-MA-EN

18 Sept 01

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: 293d BSB Asbestos Management Plan

1. The purpose of the enclosed Asbestos Management Plan is to establish and outline procedures for the identification, handling and abatement of asbestos containing materials (ACM) within all structures owned and leased by 293d BSB. This plan will be updated when current policies change or conditions dictate.
2. The BSB Asbestos Control Office and POC for all asbestos matters is Mr. Bernd Weinerth, Environmental Management Office, DSN 381-7007.

FOR THE COMMANDER

Enclosure

ANGELA MARIA LUNGU
MAJ, EN
Director of Public Works

DISTRIBUTION:
ASBESTOS MANAGEMENT TEAM
MEMBERS

ASBESTOS MANAGEMENT PLAN (Sept 2001)

- 1. PURPOSE**
- 2. REFERENCES**
- 3. ASBESTOS MANAGEMENT PROGRAM REQUIREMENTS**
- 4. ASBESTOS MANAGEMENT PROGRAM RESPONSIBILITIES**
- 5. ASBESTOS MANAGEMENT TEAM**
- 6. BSB ASBESTOS CONTROL OFFICER**
- 7. ASBESTOS MANAGEMENT SURVEY**
- 8. OPERATIONS AND MAINTENANCE PROGRAM**
- 9. OPERATIONS AND MAINTENANCE PLAN**
- 10. MEDICAL AND RESPIRATORY PROTECTION PROGRAM**
- 11. AMP FOR CHILD DEVELOPMENT CENTERS**

APPENDIX A	Regulations
APPENDIX B	Survey Results
APPENDIX C	Asbestos Abatement Contracts
APPENDIX D	Asbestos Training Documentation
APPENDIX E	New Asbestos Abatement Management Contract
APPENDIX F	Operation and maintenance plan translation

ASBESTOS MANAGEMENT PLAN (Sept 2001)

1. PURPOSE: The purpose of this plan is to establish and outline procedures for the identification, handling and abatement of asbestos containing materials (ACM) within all structures owned and leased by 293d BSB.

2. REFERENCES: Due to the multinational nature of personnel living in and/or working in BSB facilities, a broad spectrum of asbestos laws, regulations, directives and standards (collectively referred to as regulations throughout the balance of this plan) must be complied with. They include European Union (EU), Host Nation and United States (US) regulations. Appendix A lists the various regulations. Copies of the regulations and survey results are available for review in the Directorate of Public Works, Environmental Management Office (EMO), Taylor Barracks, Bldg. # 346, Room # 306.

3. ASBESTOS MANAGEMENT PROGRAM REQUIREMENTS: All ACM (both friable and non-friable) in BSB facilities must be managed in a manner that minimizes the potential for the release of asbestos fibers to the environment. To achieve this, the following items shall be complied with:

- (A) Exclude asbestos containing materials in all material procurement contracts.
- (B) Handle, store, transport and dispose of ACM per applicable EU, US and HN requirements. Note that asbestos is classified as a hazardous waste/material and must be handled as such.
- (C) Establish and execute an Asbestos Management Program within 293D BSB.
- (D) Include in the Asbestos Management Program a BSB wide survey to establish and maintain an inventory of all asbestos containing materials within BSB controlled or leased facilities.
- (E) Assess all areas known or suspected to have asbestos for the existence of asbestos and its potential for exposure to individuals.
- (F) Implement a special O&M program as necessary, to minimize individual exposure to asbestos, in each area identified as containing asbestos until abatement of the material has occurred.
- (G) Minimize occupational exposures to asbestos in compliance with applicable EU, US and HN regulations and requirements.

ASBESTOS MANAGEMENT PLAN (Sept 2001)

4. ASBESTOS MANAGEMENT PROGRAM RESPONSIBILITIES: The BSB Commander will establish, maintain and support the Asbestos Management Plan by:

(A) Forming a BSB Asbestos Management Team to establish program plans and policies. Members of the team should include personnel from the Public Affairs Office, Directorate of Public Works, Staff Judge Advocates Office, Preventive Medicine Office, Safety Office and other interested parties as necessary.

(B) Designating a BSB Asbestos Control Officer who will execute the Asbestos Management Program plans and policies. The designated individual must demonstrate accreditation from recognized US and/or HN authorities, before assuming any asbestos management planning responsibilities.

(C) Ensuring compliance with all applicable EU, US and HN regulations in addition to USAREUR policies relative to asbestos management and disposal, including required training of personnel.

5. ASBESTOS MANAGEMENT TEAM: In recognition that the expertise required to protect the health and safety of our workers as well as the environment from the hazards of asbestos exceeds the abilities of any single individual, the BSB has opted to form an Asbestos Management Team.

(A) The team shall meet annually to review the asbestos management program status, identify problem areas, formulate future action plans and develop public information plans.

(B) The team shall identify groups of workers that may become exposed to asbestos fibers during the course of their assigned duties.

(C) The team shall assist in procuring and providing the necessary personal protective equipment and clothing to those workers identified under item 5 (B).

(D) The team shall establish worker education, training and exposure notification programs for e workers identified under item 5 (B).

(E) The team shall ensure a medical surveillance program for all workers identified under item 5 (B) is in place.

ASBESTOS MANAGEMENT PLAN (Sept 2001)

(F) In addition to the Asbestos Control Officer, the chiefs of the following offices shall designate a representative as a member of the Asbestos Management Team:

1) EMO	DPW	DSN 381-8675
2) O&M	DPW	DSN 381-8927
3) ERMD	DPW	DSN 381-7247
4) ESD	DPW	DSN 381-7666
5) PAO	BSB	DSN380-1660
6) SAFETY	BSB	DSN 380-1670
7) LEGAL OFFICE	BSB	DSN381-7220
8) PREVENTIVE MEDICINE	HMEDDAC	DSN 371-2725

6. BSB ASBESTOS CONTROL OFFICER: The Asbestos Control Officer shall be appointed by the BSB Commander and shall implement and execute the Asbestos Management Program by:

(A) Developing a standing operation procedure (SOP) that describes from cradle (survey and discovery) to grave (abatement and disposal) effective management practices to minimize asbestos fiber release into the environment.

(B) Preparing and revising (as necessary) the Asbestos Management Plan.

7. ASBESTOS MANAGEMENT SURVEY: The entire BSB (excluding housing) was surveyed for asbestos and the results compiled in a report dated 1991. Based on the results of the initial survey, three more comprehensive field surveys were performed between 1996 and 1997. The comprehensive surveys including assessing the relative risk ACM posed to health and the environment. A copy of the 1996 and 1997 survey results are included in Appendix B. Based on ACM condition, ACM type and other factors, the asbestos was assigned a numeric value between 0-100. Asbestos with a point value above 80, was designated Urgency Level I. A point value between 70-79 yielded an Urgency Level II designation, and a point value of less than 70 yielded a Urgency Level III designation. All Urgency Level I & II asbestos requires abatement. Urgency Level III asbestos does not require abatement, but its condition must be re-evaluated every five years. Within the BSB, there were only three facilities that contained Urgency Level I or II asbestos. Projects to abate the asbestos were initiated and completed in 2000. These projects are listed in Appendix C.

ASBESTOS MANAGEMENT PLAN (Sept 2001)

8. Operations and Maintenance Program: Elements of O&M Program:

- a) Determination of response actions.
- b) Notification.
- c) Training.
- d) Periodic re-evaluation.
- e) Recordkeeping.

Appendix B (Survey/ Resurvey results) and C (Completed Asbestos Abatement Contracts) fulfill the requirements of the elements a, b, and e.

Appendix D provides documentation of employee training. (Element c)

For the remaining element d, Periodic re-evaluation, the following O&M Plan will provide necessary information.

9. Operations and Maintenance Plan: After completion of the above mentioned Asbestos Abatement Contracts, all ACM with urgency level I&II are gone. For the remaining ACM with urgency level III, a resurvey is scheduled for FY 03.

Each single work request will be checked for potential Asbestos Problems.

Any work that calls for Asbestos Abatement or handling with ACM will be contracted out according TRGS 519.

This procedure can be implemented, because at least 90% of the personnel dealing with the technical part of work requests/ contracts have received a minimum 40 hours training for handling ACM (Supervisor or Planner) according TRGS 519 with certification from the Trades Association. In addition, a great number of the O&M work force personnel, received the TRGS 519 certification for workers.

This also means, that each work site visit/ inspection, is at the same time an assessment of the condition of any identified ACM. Any changes in condition or doubts about it will be reported to EMO.

10. Medical and Respiratory Protection Program: If direct involvement with Asbestos Abatement Measures is anticipated for certain personnel, they should receive additional instruction for respiratory and other personal protective measures. TRGS 519 covers the whole spectrum of protection programs. Medical surveillance records are not applicable, due to the fact that no abatement work is done In-House. However all asbestos contractors are required to keep their Medical surveillance records.

ASBESTOS MANAGEMENT PLAN (Sept 2001)

11. Asbestos Management Program For Child Development Centers

Due to the fact that there is no ACM found inside the buildings used as Child Development Centers, there is no AMP for CDCS implemented.

Building # 699 was built in 1997 some years after the ban of ACM in Germany.

Buildings # 737 and 742 were found free of asbestos in a survey from 1988.

However the roof of building # 737 was classified as ACM (nonfriable) in 1990 by Coleman Lab.

An air-sampling in 1990 done by TÜV, and a dust sample from above ceiling in 2001 done by Dr. Weßling showed both negative results.(no asbestos inside)

The replacement of roof tiles and insulation is planned by DPW O&M Division.

The project was executed in April 2004.

ASBESTOS MANAGEMENT PLAN (Sept 2001)

Appendix A---Asbestos Regulations

EUROPEAN UNION

EEC DIRECTIVE 477 AND 382

EEC DIRECTIVE 217

GERMANY

ASBESTOS GUIDELINES

SUPPLEMENT to GUIDELINES

TRGS-TECHNICAL RULES for HAZARDOUS SUBSTANCES

TRGS 519 ASBESTOS

VBG and ZH-STANDARD REFERENCES of the TRADE ASSOCIATION

OTHER REGULATIONS, STANDARDS AND GUIDELINES

UNITED STATES

AHERA, 40 CFR 763.60

AHERA, 40 CFR 763.80

NESHAPS

CONSTRUCTION STANDARDS, OSHA 29 CFR 1926.58

GENERAL INDUSTRY STANDARDS, OSHA 29 CFR 1910.1001

ASBESTOS MANAGEMENT PLAN (Sept 2001)

Appendix B---Survey Results

- (1) ALL ACM FOUND AT 293D BSB
THREE SURVEYS DATED 1996&1997
- (2) PRIORITY ACM-UR I&II (History)
- (3) SAMPLE OF ASSESSMENT FORM

ASBESTOS MANAGEMENT PLAN (Sept 2001)

Appendix C---Asbestos Abatement Contracts

- 1) CONTRACT NUMBER: DACA-90-97-C-0054
CONTRACT TITLE: ASBESTOS SANITATION PRECAUTIONS IN BARRACKS OF
AMERICAN FORCES IN MANNHEIM.
TAYLOR BKS, BLDG 335,334,344.
FUNARI BKS, BLDG 818
SULLIVAN BKS, BLDG 231,234,235.
COLEMAN BKS, BLDG 4,17,21,1484,1371.
SPINELLI BKS, BLDG 1502.

- 2) CONTRACT NUMBER: DACA-90-97-C-0075
CONTRACT TITLE: ASBESTOS SANITATION PRECAUTIONS IN BARRACKS OF
AMERICAN FORCES IN MANNHEIM.
SULLIVAN BKS, BLDG 212,251.

- 3) CONTRACT NUMBER: DACA-90-97-C-0053
CONTRACT TITLE: ASBESTOS SANITATION PRECAUTIONS IN BARRACKS OF
AMERICAN FORCES IN MANNHEIM.
SULLIVAN BKS, BLDG 241,245,243.
SPINELLI BKS, BLDG 1529.

- CONTRACTING AGENCY: STAATLICHES HOCHBAUAMT HEIDELBERG
BERGHEIMER STRASSE 147
69115 HEIDELBERG
MR. ZAHN, TEL.:06221-530319

ALL THREE CONTRACTS WERE COMPLETED IN FY 2000

ASBESTOS MANAGEMENT PLAN (Sept 2001)

Appendix D Asbestos Training Documentation

The following DPW employees received TRGS 519 Training or TRGS 519 Recertification Training. (Supervisor or Planner)

ENVIRONMENTAL MGT OFFICE

Boone, Terry	2000
Gebreyohannes, Yitbarek	1997
Schork, Franz	1998
Weinerth, Bernd	1998
Ziegler, Wolfgang	1998

ESTIMATING& FACILITIES INSP BRANCH

Apfel, Peter	1997
Bartmann, Alfred	1998
Knab, Michael	1997
Moy, Ernst	1997(AHERA)
von der Au, Stefan	1998

ENGINEERING SERVICES BRANCH

Butz, Wolfgang	1999
Frank, Dieter	1999
Hornig, Erich	1997
Klein, Helmut	1995(AHERA)

CONTRACT MGT BRANCH

Pasberg, Bernhard	1995(AHERA)
Velhagen, Klaus	1995(AHERA)

In addition each shop from O&M Division has a great number of workers, who received the TRGS 519 certification for workers.

ASBESTOS MANAGEMENT PLAN (Sept 2001)

Appendix E New Asbestos Abatement Management Contract

1. INTRODUCTION

Asbestos Management Program is a services contract for asbestos surveys, abatement, and training for facilities throughout Germany. The **objective** is to ensure asbestos compliance with the German federal, state and local environmental protection and safety laws and regulations. The prime contractor for this contract is Ogden Umwelt und Energie Systems GmbH. Ogden will provide Program/Project Management of all task orders and will perform work for asbestos surveys and asbestos management plans. The subcontractors are CAP Environmental and Zenith Environmental. CAP Environmental will provide AHERA and TRGS training services, and Zenith Environmental will perform all asbestos abatement work.

2. SCOPE

This contract is to provide implementation of a comprehensive asbestos management program. Tasks include, but are not limited to, the following general types of activities:

- a. **Asbestos Surveys:** Which may include, but are not limited to: building inspection, sampling, testing and report preparation to identify, for example, the potential existence of ACM in Department of Defense facilities in Germany. Includes bulk and air sampling of asbestos and ACM, analytical testing of ACM, and creating reports showing results of work effort.
- b. **Rapid Response Consulting:** Which may include, but is not limited to: providing an asbestos expert the next business day after notification, limited sampling and analysis, with a written report of recommendations.
- c. **Training – German and U.S. requirements:** Which may include, but is not limited to: providing classroom training leading towards student certification according to TRGS 519 or AHERA requirements, and other asbestos related training such as Public Awareness Training.
- d. **Developing location-specific Management Plans:** Which may include, but is not limited to: providing assistance to customers with development of a plan to reach standards required by DoD Regulation and guidance such as the Final Governing Standards (FGS), which generally require compliance with local Host Country laws and standards. Includes developing work plans and work schedules to satisfy TRGS 519 planning and reporting requirements.
- e. **Asbestos Abatement:** Which may include, but is not limited to: abatement of floor tiles, pipe insulation and roofing. Includes work site preparation and protection, removal, repair, related equipment, packaging and labeling, transportation and disposal, and replacement of abated material.

3. POINT OF CONTACT

The point of contact for this contract is Mr. Darrell McRoberts, U.S. Army Corps of Engineers Europe District, Environmental Branch. Mr. McRoberts can be contacted at DSN 336-2437.

ASBESTOS MANAGEMENT PLAN (Sept 2001)

Appendix F Operation and maintenance plan translation

9. Operations und Instandhaltungsplan: Nach Beendigung, der oben genannten Asbestbeseitigungsverträgen, sind alle asbesthaltige Materialien, der Dringlichkeitsstufen I und II, beseitigt. Für das verbleibende Material, der Dringlichkeitsstufe III, ist eine Nachuntersuchung für das Finanzjahr 2003 geplant.

Jeder einzelne Arbeitsauftrag wird hinsichtlich möglicher "Asbestprobleme" überprüft.

Jede Arbeit, die mit Asbestbeseitigung oder dem direktem Umgang mit asbesthaltigen Material zu tun hat, wird zur Vergabe (Fremdfirmen) ausgeschrieben, nach den Richtlinien der TRGS 519.

Diese Vorgehensweise ist möglich, weil mindestens 90% des Personals, die mit dem technischen Teil eines Arbeitsauftrages/Ausschreibung, zu tun haben, mindestens eine 40-stündige Ausbildung zum Umgang mit asbesthaltigem Material, als **Aufsichtsführender oder Planer gemäß TRGS 519, mit Anerkennung durch die Berufsgenossenschaft**, erhalten haben. Darüberhinaus hat eine große Anzahl der "O&M" Belegschaft, ebenfalls eine Ausbildung, **gemäß TRGS 519, mit Anerkennung durch die Berufsgenossenschaft, als Arbeiter.**

Dies bedeutet, daß bei jeder Baustellenbesichtigung/ Inspektion gleichzeitig eine Beurteilung des Zustandes der bekannten asbesthaltigen Materialien stattfindet.

Jede Änderung eines Zustandes oder etwaige Zweifel darüber werden zu EMO weitergeleitet.